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Robert J. Moran

Vice President, Government Affairs

June 25, 2012

VIA ELECTRONIC SUBMISSION

Office of Environmental Information Docket
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Re: Investigation of Groundwater Contamination near Pavillion, Wyoming
Docket ID No. EPA-HQ-ORD-2011-895

Dear Sir or Madam:

Halliburton Energy Services, Inc. ("HESI") hereby submits the attached comments regarding EPA's draft research report entitled "Investigation of Ground Water Contamination near Pavillion, Wyoming." HESI requests that these comments be made part of the public record and that they be made available to the peer review panel.

HESI is a leading provider of services to the energy industry and is the global leader with respect to hydraulic fracturing services. HESI helped pioneer the use of hydraulic fracturing in the 1940s and has been hydraulically fracturing wells in a wide variety of geographic settings and formations for over 60 years. During this time HESI has fraced many hundreds of thou and of wells and has been responsible for numerous innovations in the field of hydraulic fracturing.

The science of hydraulic fracturing includes an understanding of the geologic, petrophysical and reservoir parameters of the hydrocarbon-bearing formation and its surrounding layers and the chemistry of the stimulation fluids themselves. HESI devotes significant resources to understanding these parameters and their role in order to design stimulation programs that will successfully stimulate a formation in the manner desired, while ensuring the integrity of the production and water-bearing zones. This wealth of knowledge and experience makes HESI particularly well qualified to comment on EPA's draft investigation report and its conclusion regarding the purported role of hydraulic fracturing in allegedly contaminating drinking water aquifer in the Pavillion area.

HESI recognizes that EPA is conducting an additional round of sampling of the deep monitoring wells in the Pavillion study area based on a recognition that further sampling "is important to clarify questions about the initial monitoring results," and that in the meantime EPA has extended the comment period for the draft report until October 16. Nevertheless, based on its initial review of the Agency's draft report, HESI believes it is important to raise a number of key issues regarding the design of the study, its implementation and the conclusions EPA has drawn based on the data; these issues are discussed in the attached report by Gradient Corporation and Environmental Resources Management.

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Therefore, HESI is submitting these comments at this time in order to assist the Agency as it continues its investigations of groundwater quality issues in the Pavillion area.

While HESI understands that EPA is likewise postponing the peer review of the draft report until the additional round of sampling is completed, HESI believes that the draft report will need to be very carefully reviewed by the peer review panel when it is convened. HESI strongly supports the Agency's decision to treat the draft report as a highly influential scientific assessment for purposes of peer review.

We would be happy to respond to any questions concerning our comments and look forward to providing further input regarding this study when the results of the additional sampling are made available.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. J. Moran', with a long horizontal flourish extending to the right.

Robert J. Moran
Vice-President, Government Affairs